

Momanaee, Audrey F.

From: Stuart Lapp <slapp@stibbsco.com>
Sent: Friday, July 1, 2022 5:32 PM
To: Momanaee, Audrey F.; Josh Redelman
Cc: Baxley, Robert; Bret Davis; Tracy Sebesta
Subject: RE: NOV v. Garza (2151.013)

[External Email] Please use caution.

Audrey:

I called and left you a message about this. I can make Ortego available on July 9th but not during the week of July 11th. I can also make Ortego available on July 7th or July 8th but I intend to take Mr. Garza's deposition first and understand that your preference is to produce Mr. Garza on July 9th. If you are willing to produce Mr. Garza on July 7th or July 8th we could do Ortego on the afternoon of one of those days as well.

This email will also confirm our conversation (also confirmed by Plaintiff's Rule 26(a) disclosures) that I will withdraw NOV's claims for damages in this action (but not today).

Stuart W. Lapp
Managing Partner
Stibbs & Co., P.C., Attorneys
819 Crossbridge Dr., Spring, Texas 77373
P: 281-367-2222 F: 281-681-2330
D: 281-323-6040 C: 713-416-6233

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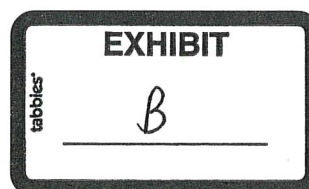
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-----Original Message-----

From: Momanaee, Audrey F. <amomanaee@balch.com>
Sent: Friday, July 1, 2022 5:03 PM
To: Josh Redelman <jredelman@stibbsco.com>
Cc: Stuart Lapp <slapp@stibbsco.com>; Baxley, Robert <rbaxley@balch.com>; Bret Davis <bdavis@stibbsco.com>; Tracy Sebesta <tsebesta@stibbsco.com>
Subject: Re: NOV v. Garza (2151.013)



Sorry - I really can't at the moment. Can I answer thru email?

Let me know on Ortego's deposition availability the week of 7/11 in Boulder as you can.

Also, just confirming our conversation you intend to withdraw or dismiss your claims for damages shortly (I took our conversation to mean today or early next week) and your statement in your disclosures referencing statutory damages is solely referencing attorneys fees under TUTSA. I don't agree that those are available in this case, including given the terms of the EDR Program, but will review and revert as appropriate.

Thanks!

Audrey F. Momanaee

Audrey F. Momanaee, Partner, Balch & Bingham LLP
811 Louisiana Street Suite 1010 Houston, TX 77002
t:(713) 362-2557 f:(866) 230-9950 e:amomanaee@balch.com www.balch.com

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> On Jul 1, 2022, at 4:35 PM, Josh Redelman <jredelman@stibbsco.com> wrote:

> [External Email] Please use caution.

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> Audrey,

>

> Can we hop on a call?

>

> Respectfully,

>

> Josh Redelman

> Attorney at Law

> Stibbs & Co., P.C., Attorneys

> 819 Crossbridge Dr., Spring, Texas 77373

> P: 281-367-2222 F: 281-681-2330

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> -----Original Message-----

> From: Momanaee, Audrey F. <amomanaee@balch.com>

> Sent: Friday, July 1, 2022 4:33 PM

> To: Stuart Lapp <slapp@stibbsco.com>

> Cc: Baxley, Robert <rbaxley@balch.com>; Josh Redelman

> <jredelman@stibbsco.com>; Bret Davis <bdavis@stibbsco.com>; Tracy

> Sebesta <tsebesta@stibbsco.com>

> Subject: Re: NOV v. Garza (2151.013)

>

> Look at para 2 for the typo - I think.

>

> Audrey F. Momanaee

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>

>

> [[image]]

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> On Jul 1, 2022, at 2:15 PM, Stuart Lapp <slapp@stibbsco.com> wrote:

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> [External Email] Please use caution.

>

> Audrey:

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> Per our discussion, please see the attached proposal.

>

> Stuart W. Lapp

> Managing Partner

> Stibbs & Co., P.C., Attorneys

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